

**HCDistrictclerk.com** BLAND, JERALDINE vs. AAA COOPER  
TRANSPORTATION (D/B/A AAA COOPER  
TRANSPORATION INC)  
Cause: 202142869 CDI: 7 Court: 269

8/9/2021

**APPEALS**

No Appeals found.

**COST STATMENTS**

No Cost Statments found.

**TRANSFERS**

No Transfers found.

**POST TRIAL WRITS**

No Post Trial Writs found.

**ABSTRACTS**

No Abstracts found.

**SETTINGS**

No Settings found.

**NOTICES**

No Notices found.

**SUMMARY**

CASE DETAILS

CURRENT PRESIDING JUDGE

<b>File Date</b>	7/15/2021	<b>Court</b>	269 <sup>th</sup>
<b>Case (Cause) Location</b>	Civil Intake 1st Floor	<b>Address</b>	201 CAROLINE (Floor: 13) HOUSTON, TX 77002 Phone:7133686370
<b>Case (Cause) Status</b>	Active - Civil		
<b>Case (Cause) Type</b>	Motor Vehicle Accident	<b>JudgeName</b>	CORY SEPOLIO
<b>Next/Last Setting Date</b>	N/A	<b>Court Type</b>	Civil
<b>Jury Fee Paid Date</b>	7/16/2021		

ACTIVE PARTIES

Name	Type	Post Attorney Jdgm
BLAND, JERALDINE	PLAINTIFF - CIVIL	QIU, ZHECHAO RAPHAEL
AAA COOPER TRANSPORTATION (D/B/A AAA COOPER TRANSPORTATION INC)	DEFENDANT - CIVIL	
DOE, JOHN	DEFENDANT - CIVIL	
AAA COOPER TRANSPORTATION (D/B/A AAA COOPER TRANSPORTATION INC)	REGISTERED AGENT	

INACTIVE PARTIES

No inactive parties found.

JUDGMENT/EVENTS

Date	Description	Order Signed	Post Jdgm	Pgs /Page	Volume Filing Attorney	Person Filing
7/15/2021	JURY FEE PAID (TRCP 216)			0		
7/15/2021	ORIGINAL PETITION			0	QIU, ZHECHAO RAPHAEL	BLAND, JERALDINE

SERVICES

Type	Status	Instrument Person	Requested Issued Served Returned Received Tracking Deliver To
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Office of Harris County District Clerk Marilyn Burgess

CITATION SERVICE	ORIGINAL	AAA COOPER	7/15/2021	7/16/2021	7/27/2021	73891382	E-MAIL
RETURN/EXECUTED	PETITION	TRANSPORTATION (D/B/A AAA COOPER TRANSPORTATION INC)					

1701 DIRECTORS BLVD SUITE 300 AUSTIN TX 78744

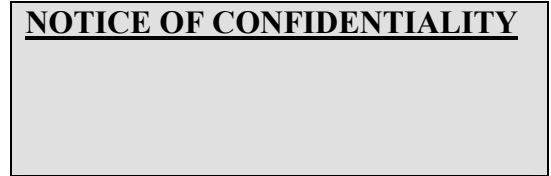
## DOCUMENTS

Number	Document	Post Jdgm	Date	Pgs
97089043	Affidavit of Service - AAA Cooper Transportation		07/29/2021	1
96863593	Platintiffs Original Petition		07/15/2021	5
-> 96863594	Civil Case Information Sheet		07/15/2021	1
-> 96863596	Request for Issuance of Service		07/15/2021	1



**REGISTERED AGENT**  
SOLUTIONS INC

**NOTICE OF CONFIDENTIALITY**



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Receipt Number: 893249  
Tracking Number: 73891382

EML

COPY OF PLEADING PROVIDED BY PLT

CAUSE NUMBER: 202142869

**DELIVERED**  
7/12/21  
BY: LM PSC: 16428  
ATX Process, LLC

PLAINTIFF: BLAND, JERALDINE

In the 269th Judicial

vs.

District Court of

DEFENDANT: AAA COOPER TRANSPORTATION (D/B/A AAA  
COOPER TRANSPORATION INC)

Harris County, Texas

CITATION

THE STATE OF TEXAS  
County of Harris

TO: AAA COOPER TRANSPORTATION (D/B/A AAA COOPER TRANSPORTATION INC) CAN BE SERVED  
THROUGH ITS REGISTERED AGENT SOLUTIONS INC  
1701 DIRECTORS BLVD SUITE 300  
AUSTIN TX 78744  
OR WHEREVER ITS REGISTERED AGENT/OFFICERS MAY BE FOUND

Attached is a copy of PLAINTIFF'S ORIGINAL PETITION.

This instrument was filed on July 15, 2021, in the above numbered and styled cause on the docket in the above Judicial District Court of Harris County, Texas, in the courthouse in the City of Houston, Texas. The instrument attached describes the claim against you.

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the District Clerk who issued this citation by 10:00 a.m. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org.

ISSUED AND GIVEN UNDER MY HAND and seal of said Court, at Houston, Texas, this July 16, 2021.



*Marilyn Burgess*

Marilyn Burgess, District Clerk  
Harris County, Texas  
201 Caroline, Houston, Texas 77002

Generated By: CYNTHIA CLAUSELL

Issued at request of:  
QIU, RAPHAEL  
3120 SOUTHWEST FWY SUITE 350  
HOUSTON, TX 77098  
713-742-2620

Bar Number: 24102385

Tracking Number: 73891382  
EML

CAUSE NUMBER: 202142869

PLAINTIFF: BLAND, JERALDINE

In the 269th

vs.

Judicial District Court

DEFENDANT: AAA COOPER TRANSPORTATION  
(D/B/A AAA COOPER TRANSPORTATION INC)

of Harris County, Texas

OFFICER/AUTHORIZED PERSON RETURN

Came to hand at \_\_\_\_\_ o'clock \_\_\_\_\_. M., on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

Executed at (address) \_\_\_\_\_  
in \_\_\_\_\_ County  
at \_\_\_\_\_ o'clock \_\_\_\_\_. M., on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_,

by delivering to \_\_\_\_\_ defendant,  
in person, a true copy of this  
Citation together with the accompanying \_\_\_\_\_ copy(ies) of the  
\_\_\_\_\_ Petition  
attached thereto and I endorsed on said copy of the Citation the date of delivery.

To certify which I affix my hand officially this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

FEE: \$ \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_ of \_\_\_\_\_

County, Texas

\_\_\_\_\_  
Affiant

By: \_\_\_\_\_  
Deputy

On this day, \_\_\_\_\_, known to me to be  
the person whose signature  
appears on the foregoing return, personally appeared. After being by me duly sworn,  
he/she stated that this citation was executed by him/her in the exact manner recited  
on the return.

SWORN TO AND SUBSCRIBED BEFORE ME on this \_\_\_\_\_ of  
\_\_\_\_\_, 20 \_\_\_\_\_

\_\_\_\_\_  
Notary Public

**2021-42869 / Court: 269**

CAUSE NO. \_\_\_\_\_

JERALDINE BLAND  
Plaintiff§  
§  
§  
§  
§  
§  
§

IN THE DISTRICT COURT OF

VS.

HARRIS COUNTY, TEXAS

AAA COOPER TRANSPORTATION  
and JOHN DOE  
Defendants

\_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION**

Plaintiff, JERALDINE BLAND, hereby files this his Original Petition, complaining of and against Defendants John Doe and AAA COOPER TRANSPORTATION d/b/a AAA Cooper Transportation, Inc., and for causes of action would respectfully show unto the Court the following:

**I.  
DISCOVERY CONTROL PLAN**

1.0 Discovery is intended to be conducted under Level 2 of the Texas Rules of Civil Procedure 190.

**II.  
PARTIES**

2.0 Plaintiff is a resident of Harris County, Texas.

2.1 Defendant AAA Cooper Transportation d/b/a AAA Cooper Transportation, Inc. (AAACT) is a foreign corporation doing business in Texas and can be served with process through its registered agent, Registered Agent Solutions, Inc., at 1701 DIRECTORS BLVD., SUITE 300 AUSTIN, TX 78744 or wherever its registered agent/officers may be found.

2.2 Defendant John Doe is a truck driver for AAACT.



### **III. JURISDICTION & VENUE**

3.0 Venue is proper in Harris County, Texas, pursuant to Tex. Civ. Prac. & Rem. Code §15.001 *et seq.* because all or a substantial part of the events or omissions giving rise to the claims arose in Harris County, Texas. This Court has jurisdiction over the parties and subject matter hereof. The amount in controversy exceeds the minimum jurisdictional limits of this Court.

### **IV. FACTS**

4.0 On or about November 10, 2019, Plaintiff was performing security services at AAAC's Property located at 5735 Little York Road, Houston, TX 77016. While Plaintiff was attempting to park her vehicle at the Property, AAAC's driver, John Doe, failed to see her and collided with her vehicle. Defendant's acts and omissions caused Plaintiff to suffer substantial injuries and damages. Based on information and belief, John Doe was working in the course and scope of employment for AAAC at all times relevant to this lawsuit.

### **V. NEGLIGENCE AND NEGLIGENCE PER SE**

#### **A. John Doe**

5.0 On information and belief, at the time of the crash made the basis of this suit, Defendant was operating his vehicle in a negligent and careless manner in the following respects which, among others, may be shown at the trial of this cause:

1. In failing to maintain an assured clear distance between his vehicle and Plaintiff's vehicle so that, considering the speed of the vehicles, traffic, and the conditions of the highway, he could safely stop without colliding with Plaintiff's vehicle in violation of Tex. Transp. Code Ann § 545.062(a);
2. In driving at a speed that was greater than was reasonable and prudent under the circumstances, and further in failing to control the speed of his vehicle as necessary to avoid colliding with Plaintiff's vehicle in violation of Tex. Transp. Code § 545.351(a)-(b);

3. In failing to operate the vehicle in a reasonable and prudent manner.
4. In failing to keep a proper lookout;
5. In failing to take any evasive action to avoid the collision; and other acts constituting negligence.

#### **B. AACT**

5.1 Defendant AACT is independently and vicariously liable to Plaintiff. Defendant John Doe was an employee, agent and/or servant of Defendant AACT. As such, Defendant AACT is vicariously liable for the negligence of Defendant John Doe due to the master-servant relationship which existed, under the doctrine of Respondent Superior.

5.2 At the time of the accident, Defendant AACT entrusted its vehicle to Defendant John Doe. At the time of the accident made the basis of this suit, Defendant John Doe was an unsafe, incompetent or reckless driver. Defendant AACT knew or should have known that Defendant John Doe was an unsafe, incompetent or reckless driver. Defendant John Doe was negligent on the date in question and such negligence proximately caused Plaintiff's injuries.

5.3 Defendant AACT is also responsible for their negligent retention, training, and supervision of Defendant John Doe. Defendant AACT had a duty to train, supervise and retain competent employees. Defendant AACT breached that duty. That breach proximately caused Plaintiff's injuries.

5.4 Each of these acts and omissions, singularly or in combination with others, constitute negligence which was the proximate cause of this incident, and the injuries sustained by the Plaintiff. Additionally, Defendants' acts or omissions in violating the Texas Transportation Code as listed above constitute negligence per se.

**VI.  
DAMAGES**

6.0 Said elements of damage which Plaintiff seeks to recover from Defendants includes compensation for the following:

1. The physical pain and mental anguish sustained by Plaintiff from date of injury to the time of trial;
2. The physical pain and mental anguish that Plaintiff will suffer in the future;
3. Loss of earnings sustained by Plaintiff from date of injury to time of trial;
4. Loss of earnings and earning capacity reasonably anticipated to be suffered by Plaintiff in the future;
5. Reasonable and necessary medical expenses incurred by Plaintiff in the treatment of Plaintiff's injuries from date of injury to time of trial;
6. Reasonable and necessary medical expenses reasonably anticipated to be sustained by Plaintiff in the future for treatment of Plaintiff's injuries; and
7. Past and future physical impairment;

As such, Plaintiff affirmatively pleads that she seeks monetary compensation in the amounts provided for by Rule 47(c)(4), Texas Rules of Civil Procedure.

**VII.  
REQUEST FOR JURY TRIAL**

7.0 Plaintiff requests a jury trial.

**VIII.  
INITIAL DISCLOSURE**

8.0 Pursuant to Rule 194 of the Texas Rules of Civil Procedure, Defendants must disclose the information or material described in Texas Rule of Civil Procedure 194.2.

**IX.  
NOTICE THAT DOCUMENTS WILL BE USED**

9.0 Pursuant to Rule 193.7 of the Texas Rules of Civil Procedure, Plaintiff hereby gives notice

that all documents produced by the Defendants will be used at any pretrial proceeding or at the trial of this case.

**X.  
PRAYER**

10.0 WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that Defendants be cited to appear and answer herein, and that upon final trial hereof, Plaintiff recover a judgment against said Defendants in the amounts awarded by the jury, plus costs of Court, pre-judgment and post-judgment interest at the legal rate, and for any and all further relief, both general and special, legal and equitable to which Plaintiff may be justly entitled.

Respectfully submitted,

**WHITE & HARRISON, TRIAL ATTORNEYS**

BY: /s/ Raphael Qiu

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Joshua R. Hilbe  
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**ATTORNEY FOR PLAINTIFF**